

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

QUORUM HEALTH CORPORATION, *et al.*,

Debtor.

Chapter 11

Case No. 20-10766 (BLS)

DANIEL H. GOLDEN, AS LITIGATION  
TRUSTEE OF THE QHC LITIGATION  
TRUST, AND WILMINGTON SAVINGS  
FUND SOCIETY, FSB, SOLELY IN ITS  
CAPACITY AS INDENTURE TRUSTEE

Plaintiffs,

v.

COMMUNITY HEALTH SYSTEMS, INC.;  
CHS/COMMUNITY HEALTH SYSTEMS,  
INC.; REVENUE CYCLE SERVICE CENTER,  
LLC; CHSPSC, LLC; PROFESSIONAL  
ACCOUNT SERVICES, INC.; PHYSICIAN  
PRACTICE SUPPORT, LLC; ELIGIBILITY  
SCREENING SERVICES, LLC; W. LARRY  
CASH; RACHEL SEIFERT; ADAM  
FEINSTEIN; AND CREDIT SUISSE  
SECURITIES (USA) LLC,

Defendants.

Adv. Pro. No. 21-51190 (BLS)

**Ref. Nos. 43, 44, 68**

**UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT REQUIREMENTS  
WITH RESPECT TO REPLY BRIEF IN SUPPORT OF DEFENDANTS COMMUNITY  
HEALTH SYSTEMS, INC., CHS/COMMUNITY HEALTH SYSTEMS, INC., REVENUE  
CYCLE SERVICE CENTER, LLC, CHSPSC, LLC, PROFESSIONAL ACCOUNT  
SERVICES, INC., PHYSICIAN PRACTICE SUPPORT, LLC, ELIGIBILITY  
SCREENING SERVICES, LLC, W. LARRY CASH, RACHEL SEIFERT,  
AND ADAM FEINSTEIN'S MOTION TO DISMISS**

Defendants Community Health Systems, Inc., CHS/Community Health Systems, Inc., Revenue Cycle Service Center, LLC, CHSPSC, LLC, Professional Account Services, Inc., Physician Practice Support, LLC, Eligibility Screening Services, LLC, W. Larry Cash, Rachel Seifert, and Adam Feinstein (collectively, the “Movants”) hereby file this motion (the “Motion for Leave”) for the entry of an order, substantially in the form attached hereto as Exhibit A (the “Proposed Order”), pursuant to Rule 7007-2(a)(iv) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), authorizing the Movants to exceed the default page limit for the Movants’ reply brief in support of their motion to dismiss (the “Reply”), which is being filed concurrently herewith. In support of this Motion for Leave, the Movants respectfully state as follows:

1. On October 25, 2021, the above-captioned plaintiffs (the “Plaintiffs”) commenced the Adversary Proceeding by filing a complaint [Dkt. 1] against the Movants and Credit Suisse Securities (USA) LLC (“Credit Suisse”).

2. On January 14, 2022, the Movants filed their motion to dismiss the complaint [Dkt. 43], along with a supporting brief [Dkt. 44].

3. Also on January 14, 2022, defendant Credit Suisse filed its motion to dismiss the complaint [Dkt. 47], along with a supporting brief [Dkt. 48] (collectively with Movants’ motion to dismiss, the “Motions”).

4. On April 1, 2022, the Plaintiffs moved the Court for an order permitting them to exceed the page limit prescribed by Local Rule 7007-2(a)(iv) with respect to their answering brief [Dkt. 69]. The Plaintiffs filed their omnibus brief in opposition to the Motions (the “Opposition”) on the same day, totaling sixty (60) pages [Dkt. 68].

5. In reply to the Opposition and in further support of their motion to dismiss, the

Movants submit their Reply contemporaneously with this Motion for Leave.

6. The Local Rules provide, in relevant part, that reply briefs shall not exceed fifteen (15) pages in length. Del. Bankr. L.R. 7007-2(a)(iv). However, a reply brief may exceed the 15-page limitation set forth in Local Rule 7007 with leave of Court. *Id.*

7. The Reply totals only twenty (20) pages notwithstanding that the Opposition is sixty (60) pages in length and raises nine (9) separate arguments. While the Movants made the Reply as concise as possible under the circumstances, the Movants could not provide the Court with sufficient information and analyses for the full and fair adjudication of the matters presented in the Opposition within the 15-page limit prescribed by Local Rule 7007-2(a)(iv).

8. On April 19, 2022, counsel for the Movants sought Plaintiffs' consent to file a twenty-page Reply. Plaintiffs consented to the requested enlargement.

9. The Movants respectfully submit that granting leave to exceed the default page limitation prescribed by Local Rule 7007-2(a)(iv) is appropriate and justified. Plaintiffs will not be prejudiced by the extension of the default page limitations applicable to the Reply, and the five (5) extra pages will allow the Court to more fully analyze and adjudicate the issues presented.

WHEREFORE, for the foregoing reasons, the Movants respectfully request that the Court enter the Proposed Order, granting the relief requested herein and such further relief the Court deems just and proper.

[Signature Page Below]

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May 2, 2022